



September 18, 2008

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB Docket 06-36, Certification of CPNI Filing
for InterLinx Communications, LLC

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. § 64.2009(e), InterLinx Communications, LLC hereby files the attached certification of compliance with respect to customer proprietary network information ("CPNI") for 2007 and 2008. *See* 47 C.F.R. § 64.2001 *et seq.*

Please contact the undersigned should you have any questions concerning this filing.

Sincerely,

V. Lowry Snow
Manager and General Counsel

cc: Marcy Greene, via email to marcy.greene@fcc.gov
Robert Somers, via email to robert.somers@fcc.gov
Byron McCoy, via email to byron.mccoy@fcc.gov
Best Copy and Printing, via email to fcc@bcpiweb.com

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007 and 2008

Date filed: 18 September 2008

Name of company covered by this certification: InterLinx Communications, LLC

Form 499 Filer ID: 825622

Name of signatory: V. Lowry Snow

Title of signatory: Manager and General Counsel

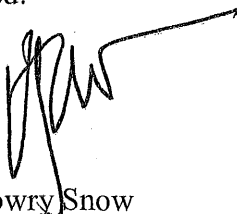
I, V. Lowry Snow, certify that I am an officer of InterLinx Communications, LLC ("InterLinx"), and that I have personal knowledge that InterLinx has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how InterLinx's procedures ensure that InterLinx is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Please see attached Statement of Policies and Procedures.

InterLinx has not taken any actions against data brokers in 2007 or 2008. We understand that companies must report on any information that it has with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

InterLinx has not received any customer complaints in 2007 or 2008 concerning the unauthorized release of CPNI.

Signed:

A handwritten signature in black ink, appearing to be 'V. Lowry Snow', with a long horizontal stroke extending to the right.

V. Lowry Snow

Statement of Policies and Procedures of InterLinx Communications, LLC

Related to the Protection of CPNI

InterLinx Communications, LLC ("InterLinx") has established policies and procedures to ensure that it complies with Section 222 of the Communications Act, 47 U.S.C. § 222, and the Commission's customer proprietary network information ("CPNI") regulations, 47 C.F.R. § 64.2001 *et seq.*

InterLinx's duty to protect the confidentiality of CPNI. InterLinx is a competitive provider that offers services to other carriers who are resellers, as well as leased private fiber optic networks. Although InterLinx does not bill individual end users for traffic and individual end users are not required to provide any CPNI to InterLinx, InterLinx has a duty to protect the confidentiality of CPNI, including CPNI of its customers who are other carriers. Should InterLinx elect to provide services to individual end users in the future, InterLinx will continue to follow the applicable CPNI regulations for those customers.

Use of CPNI without customer approval is limited. InterLinx will not use, disclose, or permit access to CPNI without customer approval except as permitted or required by 47 U.S.C. § 222(c)(1) and (d), and 47 C.F.R. § 64.2005. Otherwise, InterLinx may only use, disclose, or permit access to its customer's individually identifiable CPNI if the customer gives opt-in consent, which is express written, oral, or electronic consent. *See* 47 C.F.R. § 64.2007.

Customer approval for use of CPNI. InterLinx does not allow CPNI to go outside of InterLinx for marketing purposes and InterLinx does not sell or release CPNI to third parties. Consistent with 47 C.F.R. § 64.2009(a), InterLinx has established a system that will identify whether customers have approved use or disclosure of their CPNI, and will allow a customer to change their preferences. If InterLinx decides to share CPNI with joint venture partners or independent contractors for marketing purposes in the future, InterLinx will obtain opt-in consent from customers before sharing CPNI.

Customer notice. InterLinx will notify customers of their right to restrict use of and disclosure to CPNI prior to any solicitation for customer approval. Consistent with 47 C.F.R. § 64.2008, InterLinx will ensure that sufficient information is provided in the notice to allow the customer to make an informed decision and InterLinx will maintain records of notifications for at least one year.

Access to CPNI by InterLinx personnel. InterLinx has a policy that it will only release CPNI to those within InterLinx that are directly involved in the provision of services. Consistent with 47 C.F.R. § 64.2009(b), InterLinx has trained its personnel, and will train new employees, regarding use of CPNI and when they are and are not authorized to use CPNI, subject to an express disciplinary process. InterLinx personnel must first obtain supervisory approval of any proposed outbound marketing request for customer approval. Pursuant to 47 C.F.R. § 64.2009, InterLinx will maintain a record for at least one year for any marketing campaigns that use customer CPNI.

Access to CPNI by customers. Pursuant to 47 C.F.R. § 64.2010, InterLinx has taken reasonable steps to discover and protect against attempts to gain unauthorized access to CPNI. With its current limited number of customers, InterLinx properly authenticates a customer prior to disclosing CPNI. InterLinx currently does not provide online access to CPNI related to a telecommunications service account.

Notification of account changes. Pursuant to 47 C.F.R. § 64.2010, InterLinx will immediately notify customers whenever there is a change in the CPNI.

Notification of CPNI security breaches. InterLinx has not experienced any CPNI security breaches. If such a CPNI security breach were to occur, InterLinx has procedures in place to notify law enforcement and affected customers according to the requirements in 47 C.F.R. § 64.2011.

Annual review of CPNI compliance. InterLinx will review its procedures regarding compliance with the CPNI regulations at least once a year at the time when it files the CPNI compliance certification with the Commission.